Message

From: Akers, Brad [Akers.Brad@epa.gov]

Sent: 11/4/2021 10:55:17 AM

To: Mills, Andrew [mills.andrew@epa.gov]

CC: Febres, Andres [febres-martinez.andres@epa.gov]
Subject: RE: South Carolina Construction Permit Question

Hi Andrew,

Did you mean to include James Purvis here? I'll take a look at your questions once I sign on, but I am pretty sure you wanted James Purvis.

Brad

From: Mills, Andrew <mills.andrew@epa.gov> Sent: Wednesday, November 3, 2021 5:27 PM

To: Akers, Brad <Akers.Brad@epa.gov>; Febres, Andres <febres-martinez.andres@epa.gov>; Barringer, James

<James.Barringer@ardaghgroup.com>

Subject: South Carolina Construction Permit Question

Hey all,

I hope things are going well. I'm on a team putting together a CD for the New Indy Emergency Order case and we want to better understand SC's construction permits. A few question we have are:

Does SC issue construction permits first then incorporate the construction permits into a Title V permit or do they have a combined permitting program?

Do the construction permits live on in perpetuity or do they expire?

Are the construction permits eventually succeeded by other permits?

We've had issues in the past where a state permit references a CD for certain terms and conditions and then the CD expires, allowing those terms and conditions to expire with it. Our goal is to get the specific terms of the CD into a Title V eventually but we want to make sure we're standing on firm ground during the permitting process.

Thank you and if these questions are off base I can give more context over a teams call.